

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LORD ABBETT AFFILIATED FUND, INC.; LORD ABBETT SERIES FUND, INC. - GROWTH & INCOME PORTFOLIO; LORD ABBETT SERIES FUND, INC. - CLASSIC STOCK PORTFOLIO; LORD ABBETT RESEARCH FUND, INC. - LORD ABBETT CALIBRATED DIVIDEND GROWTH FUND; LORD ABBETT SECURITIES TRUST - LORD ABBETT FUNDAMENTAL EQUITY FUND; and LORD ABBETT GLOBAL FUND, INC. - LORD ABBETT MULTI-ASSET GLOBAL OPPORTUNITY FUND

Plaintiffs,

v.

AMERICAN INTERNATIONAL GROUP, INC.; MARTIN J. SULLIVAN; STEVEN J. BENSINGER; JOSEPH CASSANO; ANDREW FORSTER; ALAN FROST; DAVID HERZOG; ROBERT LEWIS; CITIGROUP GLOBAL MARKETS INC.; CREDIT SUISSE SECURITIES (USA) LLC; DEUTSCHE BANK SECURITIES INC.; DOWLING & PARTNERS SECURITIES, LLC; FOX-PITT KELTON COCHRAN CARONIA WALLER (USA) LLC; JP MORGAN SECURITIES INC.; KEEFE, BRUYETTE & WOODS, INC.; MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED; UBS SECURITIES LLC; WELLS FARGO SECURITIES LLC; STEPHEN F. BOLLENBACH; MARSHALL A. COHEN; MARTIN S. FELDSTEIN; ELLEN V. FUTTER; STEPHEN L. HAMMERMAN; RICHARD C. HOLBROOKE; GEORGE L. MILES, JR.; FRED H. LANGHAMMER; MORRIS W. OFFIT; JAMES F. ORR III; VIRGINIA M. ROMETTY; MICHAEL H. SUTTON; EDMUND S.W. TSE; ROBERT B. WILLUMSTAD; FRANK G. ZARB; AND PRICEWATERHOUSECOOPERS LLP,

Defendants.

Case No. 15-CV-00774 (LTS) (DCF)

ECF CASE

**NOTICE OF VOLUNTARY DISMISSAL OF ALL CLAIMS AND CAUSES OF ACTION
AS AGAINST PRICEWATERHOUSECOOPERS LLP AND VOLUNTARY DISMISSAL
OF COMMON LAW FRAUD CLAIMS AS AND ONLY AS AGAINST MARTIN
SULLIVAN, STEVEN BENSINGER, JOSEPH CASSANO, ANDREW FORSTER,
DAVID HERZOG AND ROBERT LEWIS**

PLEASE TAKE NOTICE that pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Plaintiffs voluntarily dismiss all claims and causes of action alleged in the above-captioned matter against PricewaterhouseCoopers LLP. All other Defendants remain parties to this proceeding.

Plaintiffs also voluntarily dismiss their Eighth Claim For Relief For Common Law Fraud Violations and only that claim as and only as against (1) Martin Sullivan, (2) Steven Bensinger, (3) Joseph Cassano, (4) Andrew Forster, (5) David Herzog, and (6) Robert Lewis. This cause of action remains as against Defendant American International Group, Inc.

Dated: March 30, 2015
New York, New York

Respectfully submitted,

ABRAHAM, FRUCHTER & TWERSKY, LLP

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- Classic Stock Portfolio; Lord Abbett Research Fund, Inc. - Lord Abbett Calibrated Dividend Growth Fund; Lord Abbett Securities Trust - Lord Abbett Fundamental Equity Fund; And Lord Abbett Global Fund, Inc. - Lord Abbett Multi-Asset Global Opportunity Fund